

Presented to the Court by the foreman of the  
Grand Jury in open Court, in the presence of  
the Grand Jury and FILED in the U.S.  
DISTRICT COURT at Seattle, Washington.

May 15 2024  
By Ravi Subramanian, Clerk  
Deputy

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
Plaintiff,

v.

KEITH DANIEL FREERKSEN,  
Defendant.

NO. **CR 24 - 086 TL**

**INDICTMENT**

The Grand Jury charges that:

**COUNT 1**

**(Travel with Intent to Engage in a Sexual Act with a Minor)**

Between on or about January 3, 2024, and January 8, 2024, in Skagit County,  
within the Western District of Washington, and elsewhere, KEITH DANIEL  
FREERKSEN did knowingly travel in interstate commerce, to wit, between South Haven  
Township, Michigan, and Mount Vernon, Washington, for the purpose of engaging in  
illicit sexual conduct with a person under the age of eighteen, that is, the sexual acts of  
contact between the penis and the vulva, contact between the mouth and the penis, and  
contact between the mouth and the vulva.

1 All in violation of Title 18, United States Code, Sections 2423(b) and 2246(2)(A)  
2 and (B).

3 **FORFEITURE ALLEGATION**

4 The allegations contained in Count 1 of this Indictment are hereby realleged and  
5 incorporated by reference for the purpose of alleging forfeiture. Upon conviction of the  
6 offense alleged in Count 1, KEITH DANIEL FREERKSEN shall forfeit to the United  
7 States, pursuant to Title 18, United States Code, Section 2428(a), any property that was  
8 used or intended to be used to commit or to facilitate the commission of such offenses,  
9 and any property constituting or derived from proceeds of the offense.

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1       **Substitute Assets.** If any of the above-described forfeitable property, as a result of  
2 any act or omission of the defendant,

- 3           a.     cannot be located upon the exercise of due diligence;  
4           b.     has been transferred or sold to, or deposited with, a third party;  
5           c.     has been placed beyond the jurisdiction of the Court;  
6           d.     has been substantially diminished in value; or,  
7           e.     has been commingled with other property which cannot be divided  
8                 without difficulty,


9 it is the intent of the United States to seek the forfeiture of any other property of the  
10 defendant, up to the value of the above-described forfeitable property, pursuant to  
11 Title 21, United States Code, Section 853(p).

12  
13                   A TRUE BILL: *yes*

14                   DATED: *May 15, 2024*

15                   *Signature of Foreperson redacted pursuant*  
16                   *to the policy of the Judicial Conference of*  
17                   *the United States.*

18                   \_\_\_\_\_  
19                   FOREPERSON

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19 \_\_\_\_\_  
20 TESSA M. GORMAN  
21 United States Attorney

21 *CR to me*  
22 \_\_\_\_\_  
23 MARCI ELLSWORTH  
24 Assistant United States Attorney

24 *CR*  
25 \_\_\_\_\_  
26 CECELIA GREGSON  
27 Assistant United States Attorney